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Attorney for Defendant Marlena Sonn

UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA

KPG Investments, Inc.; and Kendalle Getty,

Plaintiffs,

v.

Marlena Sonn; and Does 1-20,

Defendants.

Case No.: 3:22-cv-00236-ART-CLB

**Joint Stipulation and Order to Extend
Deadline for Responding to
Complaint
(Second Request)**

Pursuant to Local Rule IA 6-1, Plaintiffs KPG Investments, Inc. and Kendalle Getty,
and Defendant Marlena Sonn, by and through their respective counsel of record, hereby
stipulate and agree as follows:

1 1. This action is closely related to the subject matter of a separate and
2 subsequently-filed action proceeding in the U.S. District Court for the Eastern District of
3 New York, *see Sonn v. Getty, et al.*, No. 1:22-cv-02758-RPK-VMS (the “New York Action”);
4 and

5 2. Counsel for all parties to both the New York Action and the current case have
6 conferred and agreed to voluntarily transfer the New York Action to the District of Nevada,
7 and subsequently seek the consolidation of both actions before this Court in order to avoid
8 parallel litigation and preserve judicial resources; and

9 3. There is good cause for extending the deadline for answering or otherwise
10 responding to the complaint until such time as both actions can be consolidated before this
11 Court; and

12 4. On June 2, 2022, this Court granted the parties’ request to extend Defendant’s
13 deadline to answer or otherwise respond to the complaint in the above-captioned action to
14 June 16, 2022 (ECF No. 5); and

15 5. Subsequently, the U.S. District Court for the Eastern District of New York set
16 a telephonic conference for June 29, 2022, to address transfer of the New York Action to the
17 District of Nevada. The parties anticipate that the New York Action will be transferred to
18 the District of Nevada soon thereafter, at which point the parties will move to consolidate
19 this action therewith; and

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6. The parties agree that Defendant's deadline to answer or otherwise respond to the complaint in the above-captioned action be, and hereby is, extended until July 20, 2022, to allow time for the transfer and consolidation of both actions before this Court.

Dated: June 16, 2022

McDONALD CARANO LLP

/s/ Daniel I. Aquino

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Attorney for Defendant

IT IS SO ORDERED:

UNITED STATES DISTRICT JUDGE /
UNITED STATES MAGISTRATE JUDGE

DATED: _____

CERTIFICATE OF SERVICE

The undersigned certifies that a copy of this document was served on the persons shown, on the date shown, by the method shown:

June 16, 2022 CM/ECF All counsel of record

/s/ Roger Wenthe
Roger W. Wenthe